

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	
Tracey M. Schindler,)	Bankruptcy No. 18-24082 CMB
)	Chapter 13
)	Related to Document No. 68 and 69
Debtor)	
)	
Ronda J. Winnecour, Chapter 13 Trustee,)	
)	
Movant)	
)	
vs.)	
)	
Tracey M. Schindler)	
)	
Respondent)	

RESPONSE TO TRUSTEE’S MOTION TO DISMISS

AND NOW, come the Debtors, Tracey M. Schindler (“Debtor”), by and through attorney, Christopher M. Frye and Steidl and Steinberg, P.C., and respectfully responds to the Movant’s motion as follows as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Since the filing of the Motion, the Debtor has made additional payments which would reduce the amount to complete.
7. Admitted.
8. Admitted in part and denied in part. The Debtor admits that the plan goals have not been met at present. The Debtor has made additional payments and just needs a short amount of additional time to meet the Plan goals and complete.

WHEREFORE, the Debtor, Tracey M. Schindler, respectfully request this Honorable Court to deny the Movant's motion.

Respectfully submitted,

October 26, 2023

DATE

/s/ Christopher M. Frye

Christopher M. Frye, Esquire
Attorney for the Debtor
STEIDL & STEINBERG, P.C.
Suite 2830 – Gulf Tower
707 Grant Street
Pittsburgh, PA 15219
(412) 391-8000
PA I. D. No. 208402
chris.frye@steidl-steinberg.com